

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: Petition by ITC DeltaCom Communications, Inc. and b/a ITC DeltaCom for Arbitration of Certain Unresolved Issues in Interconnections Negotiations Between ITC DeltaCom and BellSouth Telecommunications, Inc.
Docket No. 99-00430

and

Petition by ICG Telecom Group, Inc. for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to Section 252(b) of the Telecommunications Act of 1996
Docket No. 99-00377

ICG TELECOM GROUP, INC.'s MOTION FOR
CONSOLIDATION ON RECIPROCAL COMPENSATION ISSUE

Pursuant to TRA Rule 1220-5-3-.09 (TRA Rules of Practice and Procedure Governing Proceedings under Section 252 of the Federal Telecommunications Act), ICG Telecom Group, Inc. ("ICG") requests that the Tennessee Regulatory Authority consolidate the arbitration proceedings of ICG and ITC DeltaCom ("DeltaCom") solely in regard to the issue of whether reciprocal compensation should be paid for the termination of local traffic to Internet service Providers.

DeltaCom's arbitration proceeding is presently set for hearing on November 1, 2, and 3, 1999. Issue 3 in the DeltaCom arbitration proceeding is:

Should BellSouth be required to pay reciprocal compensation to ITC DeltaCom for all calls that are properly routed over local trunks, including calls to Internet Service Providers (ISPs)?

ICG's proceeding is set for November 22 and 23, 1999. Issue 1 in the ICG arbitration proceeding is:

FILE

For the purposes of this agreement, should dial-up calls to Internet service providers ("ISPs") be treated as if they were local calls for purposes of reciprocal compensation?

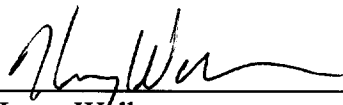
The issues are identical¹ and, as a practical matter, the resolution of the reciprocal compensation issue in the DeltaCom arbitration will strongly influence the outcome of this issue in the ICG arbitration. If consolidation is granted, ICG will pre-file direct and rebuttal testimony on this issue at the same time as DeltaCom. ICG's two witnesses on the reciprocal compensation issue are available to appear on the second and third days of the DeltaCom hearing when it is anticipated that DeltaCom's witnesses will testify.² Consolidation of this issue will avoid duplicative presentations and will not prejudice or harm the interests of any party or delay the proceedings.

Counsel for DeltaCom has informed counsel for ICG that DeltaCom has no objection to this motion.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


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¹ As proposed by ICG, the consolidated issue does not include what the appropriate compensation rate should be, only the question of whether compensation is appropriate.

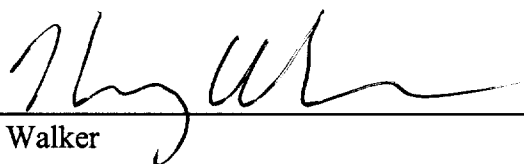
² As the TRA and the parties have done in other, similar cases. ICG presumes that, if necessary, witnesses can be heard out of order to accomodate any scheduling problems.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 8th day of October, 1999.

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